Phoenix, AZ 85004



## BEFORE THE ARIZONA CORPORATION

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## **COMMISSIONERS**

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BOB STUMP – Chairman GARY PIERCE BRENDA BURNS BOB BURNS

SUSAN BITTER SMITH

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IN THE MATTER OF THE APPLICATION OF ARIZONA-AMERICAN WATER COMPANY, AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE CURRENT FAIR VALUE OF ITS UTILITY PLANT AND PROPERTY AND FOR INCREASES IN ITS RATES AND CHARGES BASED THEREON FOR UTILITY SERVICE BY ITS ANTHEM WATER DISTRICT AND ITS SUN CITY WATER DISTRICT.

IN THE MATTER OF THE APPLICATION OF ARIZONA-AMERICAN WATER COMPANY, AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE CURRENT FAIR VALUE OF ITS UTILITY PLANT AND PROPERTY AND FOR INCREASES IN ITS RATES AND CHARGES BASED THEREON FOR UTILITY SERVICE BY ITS ANTHEM/AGUA FRIA WASTEWATER DISTRICT, ITS SUN CITY WASTEWATER DISTRICT AND ITS SUN CITY WEST WASTEWATER DISTRICT.

DOCKET NO. W-01303A-09-0343

Arizona Corporation Commission

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**DOCKET NO. SW-01303A-09-0343** 

NOTICE OF FILING SURREBUTTAL TESTIMONY OF GEORGE TURNER ON BEHALF OF RUSSELL RANCH HOMEOWNERS' ASSOCIATION, INC.

In accordance with the Procedural Order issued August 18, 2014 (as amended August 19, 2014), notice is hereby given that intervenor Russell Ranch Homeowners' Association, Inc., has filed this day the attached Surrebuttal Testimony of George Turner.

1	RESPECTFULLY SUBMITTED this 4 <sup>th</sup> day of November, 2014.				
2	BROWNSTEIN HYATT FARBER SCHRECK LLP				
3	THE STATE				
4	Jeffrey W. Crockett, Esq.				
5	One East Washington Street, Suite 2400 Phoenix, Arizona 85004				
6 7	Attorneys for Russell Ranch Homeowners' Association, Inc.				
8	ORIGINAL and thirteen (13) copies of the				
9	foregoing filed this 4 <sup>th</sup> day of November, 2014, with:				
10	Docket Control ARIZONA CORPORATION COMMISSION				
11	1200 West Washington Street Phoenix, Arizona 85007				
12					
13	COPY of the foregoing hand-delivered this 4 <sup>th</sup> day of November, 2014, to:				
14	Lyn Farmer, Chief Administrative Law Judge				
15	Hearing Division ARIZONA CORPORATION COMMISSION				
16 17	1200 West Washington Street Phoenix, Arizona 85007				
18	Steve Olea, Director				
19	Utilities Division ARIZONA CORPORATION COMMISSION				
20	1200 West Washington Street Phoenix, Arizona 85007				
21	Janice M. Alward, Chief Counsel				
22	Legal Division ARIZONA CORPORATION COMMISSION				
23	1200 West Washington Street Phoenix, Arizona 85007				
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## Brownstein Hyatt Farber Schreck, LLP One East Washington Street, Suite 2400 Phoenix, AZ 85004

1	COPY of the foregoing sent via e-mail this 4 <sup>th</sup> day of November, 2014, to:
2	tins ( day of November, 2011, ter
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## 1 BEFORE THE ARIZONA CORPORATION COMMISSION 2 **COMMISSIONERS** 3 BOB STUMP - Chairman 4 **GARY PIERCE BRENDA BURNS** 5 **BOB BURNS** SUSAN BITTER SMITH 6 7 IN THE MATTER OF THE APPLICATION DOCKET NO. W-01303A-09-0343 OF ARIZONA-AMERICAN WATER 8 COMPANY, AN ARIZONA CORPORATION, FOR A 9 DETERMINATION OF THE CURRENT FAIR VALUE OF ITS UTILITY PLANT 10 AND PROPERTY AND FOR INCREASES IN ITS RATES AND CHARGES BASED 11 THEREON FOR UTILITY SERVICE BY ITS ANTHEM WATER DISTRICT AND ITS 12 SUN CITY WATER DISTRICT. 13 **DOCKET NO. SW-01303A-09-0343** IN THE MATTER OF THE APPLICATION 14 OF ARIZONA-AMERICAN WATER COMPANY, AN ARIZONA 15 CORPORATION, FOR A DETERMINATION OF THE CURRENT 16 FAIR VALUE OF ITS UTILITY PLANT AND PROPERTY AND FOR INCREASES 17 IN ITS RATES AND CHARGES BASED THEREON FOR UTILITY SERVICE BY ITS 18 ANTHEM/AGUA FRIA WASTEWATER DISTRICT, ITS SUN CITY WASTEWATER 19 DISTRICT AND ITS SUN CITY WEST WASTEWATER DISTRICT. 20 21 22 SURREBUTTAL TESTIMONY OF GEORGE TURNER 23 ON BEHALF OF 24 RUSSELL RANCH HOMEOWNERS' ASSOCIATION, INC. 25 **NOVEMBER 4, 2014** 26 27

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Surrebuttal T	estimony of	George Tu	urner		
Dockets Nos				303A-09-0	343

1 RUSSELL RANCH HOMEOWNERS' ASSOCIATION, INC. 2 **Surrebuttal Testimony of George Turner** 3 4 November 4, 2014 5 6 Q. PLEASE STATE YOUR NAME AND ADDRESS. 7 A. My name is George Turner. My address is 18049 W. Georgia Court, Litchfield 8 Park, Arizona 85340. 9 Q. ARE YOU THE SAME GEORGE TURNER WHO PROVIDED PRE-10 FILED DIRECT TESTIMONY IN THIS DOCKET DATED OCTOBER 6, 11 2014? 12 Yes. A. 13 WHAT IS THE PURPOSE OF THIS SURREBUTTAL TESTIMONY? Q. 14 A. The purpose of this surrebuttal testimony is to reiterate the Russell Ranch 15 Homeowners' Association, Inc.'s strong support of the proposal by EPCOR Water 16 Arizona, Inc. ("EPCOR" or the "Company") to fully consolidate its five 17 wastewater districts for rate-making purposes as described in the pre-filed Direct 18 Testimony of Shawn Bradford dated September 8, 2014, as supplemented by Mr. 19 Bradford's Rebuttal Testimony dated October 20, 2014, and the pre-filed Direct 20 Testimony of Sheryl L. Hubbard dated September 8, 2014, as supplemented by 21 Ms. Hubbard's Rebuttal Testimony dated October 20, 2014. Alternatively, if the 22 Arizona Corporation Commission ("Commission") elects not to move forward 23 with full consolidation of the five wastewater districts, then the Russell Ranch 24 Homeowners' Association Inc., requests that the Commission fully deconsolidate 25 EPCOR's Agua Fria Wastewater District.

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- Q. HAVE YOU REVIEWED THE PRE-FILED TESTIMONY OF THE VARIOUS PARTIES FILED IN THIS DOCKET ON OCTOBER 6, 17, 20 AND 31, 2014, AND NOVEMBER 3, 2014?
- A. Yes.
- Q. IS THERE ANYTHING IN ANY OF THE PRE-FILED TESTIMONY WHICH CAUSES YOU TO MODIFY ANY OF THE POSITIONS OR STATEMENTS CONTAINED IN YOUR DIRECT TESTIMONY DATED OCTOBER 6, 2014?
- A. No. Full consolidation provides the best solution to address the legitimate and serious concerns that have been raised by thousands of EPCOR customers in this proceeding. Going forward, all of the Company's customers will benefit from consolidation through rates that are more stable and predictable, lower regulatory expenses, and improved operating efficiencies. I recognize the complexity of the issues in this case and the fact that no solution is ever perfect. However, the French writer Voltaire famously cautioned against allowing "the perfect to become the enemy of the good." Full consolidation represents a fair and equitable solution—and the best solution under the totality of the circumstances. Thus, the Russell Ranch Homeowners' Association, Inc., urges the Commission to approve full consolidation as proposed by EPCOR.
- Q. DOES THE FACT THAT YOU HAVE NOT ADDRESSED SPECIFIC STATEMENTS IN THE PRE-FILED TESTIMONY OF THE PARTIES IN THIS CASE MEAN THAT YOU AGREE WITH SUCH STATEMENTS?
- A. No. The fact that I have not addressed specific statements contained in the prefiled testimony of the parties in this docket does not mean that I accept that testimony in whole or in part, or that I have waived my objections to any statements contained in the testimony.
- **Q.** DOES THIS CONCLUDE YOUR TESTIMONY?
- 28 A. Yes.